

CIVIL RIGHTS COMPLAINT
42 U.S.C. § 1983

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

FILED
IN CLERK'S OFFICE
US DISTRICT COURT E.D.N.Y.

★ MAY 05 2014 ★

BROOKLYN OFFICE

Khalid Wisdom/13006690
Full name of plaintiff/prisoner ID#

Plaintiff,

JURY TRIAL DEMAND
YES ☒ NO ☐

-against-
N.Y.C. 70th Precinct Brooklyn
New York and Officer
William Simon

Enter full names of defendants
[Make sure those listed above are
identical to those listed in Part III.]

CV 14 2877
BRODIE, J.

Defendants.

LEVY, M.J.

I. Previous Lawsuits:

- A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment? Yes () No (☒)
- B. If your answer to A is yes, describe each lawsuit in the space below (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit:

Plaintiffs: n/a

Defendants: n/a

2. Court (if federal court, name the district;
if state court, name the county)

n/a

3. Docket Number: n/a

4. Name of the Judge to whom case was assigned: n/a

5. Disposition: (for example: Was the case dismissed? Was it appealed? Is it still pending?)
n/a

6. Approximate date of filing lawsuit: n/a

7. Approximate date of disposition: n/a

II. Place of Present Confinement: Nassau county correctional center

A. Is there a prisoner grievance procedure in this institution? Yes (☒) No ()

B. Did you present the facts relating to your complaint in the prisoner grievance procedure? Yes () No (☒)

C. If your answer is YES,

1. What steps did you take? n/a

2. What was the result? n/a

D. If your answer is NO, explain why not this is a street matter

E. If there is no prison grievance procedure in the institution, did you complain to prison authorities? Yes () No (☒)

F. If your answer is YES,

1. What steps did you take? n/a

2. What was the result? n/a

III. Parties:

(In item A below, place your name in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any.)

A. Name of plaintiff Khalid Wisdom

Address 726 Ocean Avenue APT 62 Brooklyn ny 11226

(In item B below, place the full name and address of each defendant)

B. List all defendants' names and the addresses at which each defendant may be served. Plaintiff must provide the address for each defendant named.

Defendant No. 1

n.y.c 70th Precint Brooklyn ny

Defendant No. 2

William Simon

OFFicer ID # 924497

Defendant No. 3

Defendant No. 4

Defendant No. 5

[Make sure that the defendants listed above are identical to those listed in the caption on page 1].

Cont. P.4

IV

Warrant squad approached me, and asked me for my name, after telling them my name, they handcuffed me, lead me outside of the court building, put me in the back seat of a unmarked van where I remained for about forty five (45) minutes before I was transported to the back of the barkley center, where I waited in the back of the van for about another half hour before I was replaced in the back of a next parole van, then transported to the 70th precinct in Brooklyn. Once at the precinct, I was lead to the detectives unit where I was then un-handcuffed and placed in a detention holding cell (cage), for about (2) hours, without being told why I was handcuffed and brought to the detective unit. After getting restless being in the pen for over two (2) hours, I then attempted to get some kind of answer as to why I was brought to the 70th precinct in handcuffs, I still recieved no reply to my questions, instead, I was lead to Finger Printing room (area), where I was fingerprinted and still not provided with why was I here for? After being finger printed and placed back into the pens for about four (4) to five (5) hours, I was then transported to central Booking in Brooklyn where I remained for about three (3) to four (4) hours, then I heard my name called, and this is when I was informed that I was being charged with robbery. Then, very soon thereafter, I was told by the same officer that my criminal case was actually dismissed and I didn't have to go before a Judge on my case. At this time, the officer led me to a side-door, and then I proceeded home.

IV. Statement of Claim:

(State briefly and concisely, the facts of your case. Include the date(s) of the event(s) alleged as well as the location where the events occurred. Include the names of each defendant and state how each person named was involved in the event you are claiming violated your rights. You need not give any legal arguments or cite to cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. You may use additional 8 1/2 by 11 sheets of paper as necessary.)

On or about the 25th day of June 2013, I was arrested and charged by the 70th Precinct in Brooklyn, with a robbery charge, Although I had know knowledge of the robbery, or participated in any robbery. However though, Prior to me being falsely accused and charged with robbery, police officers/detectives from the 70th Precinct came to my Aunts house Kicking her door nearly off of the hinges where she had to put a new lock on the door, then, the very same Police officers/detectives began showing my picture to tenants on the 5th, and 6th Floor of my building when they learned I wasn't in my aunts Apartment. On the 25th day of June 2013, I appeared in court for un-related criminal matter. On June 25 2013, While in court standing in the hallway waiting for my lawyer to appear, officers/detectives from the 70th precinct

IV. A If you are claiming injuries as a result of the events you are complaining about, describe your injuries and state what medical treatment you required. Was medical treatment received?

The injuries that I recieved was mental Anguish and mental and Emotional Instability, mental and emotional pain and suffering, cruel and unusual Punishment, Falsely arrested and maliciously prosecuted.

V. Relief:

State what relief you are seeking if you prevail on your complaint.

Monetary damages in the amount of \$ 2,000,000 dollars for mental-
cruelty, mental Anguish, mental pain and suffering, mental and emotional
Instability, and Punitive damages in the amount of \$ 2,000,000
For False Arrest, cruel and unusual Punishment, malicious prosecution
and For violating my 5th, 6th, 8th and 14th Amendments of the
United States constitutional Amendments.

I declare under penalty of perjury that on 4/24/14, I delivered this
(Date)
complaint to prison authorities to be mailed to the United States District Court for the Eastern
District of New York.

Signed this 24 day of April, 2014. I declare under penalty of
perjury that the foregoing is true and correct.

CARMINE PULGRANO
Notary Public, State of New York
No. 01PU6094168
Qualified in Nassau County
Commission Expires June 16, 2015

April 23, 2014

Carmine Pulgrano

K. Wisdom
Signature of Plaintiff

Nassau County Correctional Center
Name of Prison Facility

100 Carman Avenue East Meadow,
New York 11554

Address

13006690
Prisoner ID#

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

ROBERT C. HEINEMANN
CLERK

www.nyed.uscourts.gov

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IN CLERK'S OFFICE
US DISTRICT COURT E.D.N.Y.

★ MAY 05 2014 ★

BROOKLYN OFFICE

PLEASE REPLY TO:

☐ BROOKLYN OFFICE
U.S. COURTHOUSE
225 CADMAN PLAZA EAST
BROOKLYN, NEW YORK 11201

☒ LONG ISLAND OFFICE
US COURTHOUSE
100 FEDERAL PLAZA
PO BOX 9014
CENTRAL ISLIP, NY 11722-9014

INSTRUCTIONS FOR FILING A CIVIL RIGHTS COMPLAINT

Attached is a complaint form for filing an action under 42 U.S.C. § 1983. Observe the following instructions for completing the complaint:

1. **Caption:** It is *very important*, if possible, that you state the first and last name of each defendant and badge number, if appropriate, on pages 1 and 3 of the complaint form. You are required to furnish the correct name and address of each person on page 3 so that service of process upon each defendant can be made.

2. **Contents:** The form should be fully completed. It can be typewritten or handwritten. It must be legible. If you need more space to answer a question, attach a separate sheet of 8 ½ by 11 paper to your complaint. You are required to state facts, such as the date and location of the events. You need not make legal arguments or cite to cases. The complaint must have an original (not photocopied) signature by each plaintiff. The complaint need not be notarized.

3. **Copies:** You must send the Court the original complaint and you should keep a copy for your records. The copy can be photocopied, handwritten or typewritten, but all copies must be identical to the original.

4. **Fee:** The filing fee is \$350, payable to the Clerk of the Court, USDC, EDNY by certified check, bank check, personal check, money order or cash (if paying in person). If the filing fee is paid, the U.S. Marshal will not be directed to serve the defendants and plaintiff will be responsible for service of process on defendants. Service of the summons and complaint can be made by anyone over the age of 18 who is not a party to the action. See Fed. R. Civ. P. 4.

5. **Inability to Pay the Fee:** If you cannot pay the fee, you may apply to the Court to proceed *in forma pauperis* (IFP) pursuant to 28 U.S.C § 1915 by completing the attached form. If there is more than one plaintiff, each plaintiff must provide a separate declaration in support of the request to proceed *in forma pauperis*. If you are a prisoner, you must also complete the attached Prisoner Authorization form.

When you have completed the forms, mail the originals to:

United States District Court, EDNY
225 Cadman Plaza East; Brooklyn, NY 11201
Attention: Pro Se Office

or on Long Island to:

Clerk of United States District Court, EDNY
100 Federal Plaza; Central Islip, NY 11722-4438
Attention: Pro Se Office